

Exhibit 31
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Page 1

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

GOOGLE, LLC,)
)
PLAINTIFF,)
)
VS.) NO.
) 3:20-cv-06754-
SONOS, INC.,) WHA
)
DEFENDANT.)
)
_____)
SONOS, INC.,)
)
PLAINTIFF,)
) 3:21-CV-07559-
VS.) WHA
)
GOOGLE, LLC,)
)
DEFENDANT.)
_____)

C O N F I D E N T I A L
(THIS TRANSCRIPT HAS BEEN DESIGNATED
ATTORNEY'S EYES ONLY)

ZOOM VIDEOTAPED DEPOSITION OF

JUERGEN SCHMERDER

THURSDAY, AUGUST 25, 2022

JOB NO. 5367680

REPORTED BY: D'ANNE MOUNGEY, CSR 7872

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<p style="text-align: right;">Page 18</p> <p>1 question a different way.</p> <p>2 When you first joined Sonos back in</p> <p>3 December of 2014, did you have any direct reports?</p> <p>4 A Not immediately, but shortly thereafter.</p> <p>5 Q Do you recall roughly at what point you</p> <p>6 started having direct reports?</p> <p>7 A I don't. It wasn't too long. Months.</p> <p>8 Q Do you recall how many direct reports you</p> <p>9 eventually had?</p> <p>10 A Not the exact number, no.</p> <p>11 Q Do you have a ballpark estimate?</p> <p>12 A Less than ten.</p> <p>13 Q So when you started to have -- having these</p> <p>14 direct reports, we'll say less than ten, were they</p> <p>15 engineers, product managers?</p> <p>16 What were their roles and responsibilities?</p> <p>17 A They were product managers and developer</p> <p>18 advocates, which is a role that is sort of a support</p> <p>19 function for external developers, developers of</p> <p>20 other companies.</p> <p>21 Q What do you mean by "developers of other</p> <p>22 companies"?</p> <p>23 A My role was platform in partnerships, so we</p> <p>24 worked with partners, would implement the Sonos API</p> <p>25 to make their media, most often music, but also</p>	<p style="text-align: right;">Page 20</p> <p>1 platform. A developer advocate for Zoom would help</p> <p>2 you build integrations into Zoom, so you could have</p> <p>3 affects on the video feed or transcribe recordings</p> <p>4 automatically.</p> <p>5 A developer advocate for Sonos would help</p> <p>6 you build music integrations or media integrations</p> <p>7 to get audio playing on Sonos speakers.</p> <p>8 Q I see. So essentially it helps -- a</p> <p>9 developer advocate would work with individuals or</p> <p>10 representatives from other companies to help</p> <p>11 integrate those products onto the Sonos platform; is</p> <p>12 that fair?</p> <p>13 A That is correct.</p> <p>14 Q The next bullet point -- we'll come back to</p> <p>15 that in a second.</p> <p>16 The next bullet point says you: "Extended</p> <p>17 the Sonos partner ecosystem."</p> <p>18 What do you mean by the by "Sonos partner</p> <p>19 ecosystem"?</p> <p>20 A What I mean with the Sonos partner</p> <p>21 ecosystem is the company is the kind of company that</p> <p>22 had integration on Sonos.</p> <p>23 Q And here you list: "Voice Assistants,</p> <p>24 (Amazon Alexa), Smart Home Hubs & Components</p> <p>25 (SmartThings, Savant, Crestron, Lutron, iPort)",</p>
<p style="text-align: right;">Page 19</p> <p>1 audio books, podcasts, play on Sonos speakers</p> <p>2 controlled by the Sonos app or controlled by another</p> <p>3 app.</p> <p>4 Q Let's take a look a little bit at what you</p> <p>5 have written here on your profile.</p> <p>6 So I think you just explained a little bit</p> <p>7 as to what platform and partnerships were.</p> <p>8 But what do you mean by "platform"?</p> <p>9 A By "platform," the APIs that Sonos had</p> <p>10 defined and the infrastructure that Sonos made</p> <p>11 available to partners to build their own</p> <p>12 integrations.</p> <p>13 Q So the integrations or the collaborations</p> <p>14 you have with other partners utilizes the Sonos</p> <p>15 infrastructure?</p> <p>16 A That is correct.</p> <p>17 Q And the first bullet point you say that you</p> <p>18 built a team of developer advocates.</p> <p>19 What are developer advocates?</p> <p>20 A Developer advocates are technical people</p> <p>21 often with a developer background who help other</p> <p>22 developers build what they are trying to build using</p> <p>23 their company's technology.</p> <p>24 So a developer advocate for Veritext would</p> <p>25 help you build legal applications on a Veritext</p>	<p style="text-align: right;">Page 21</p> <p>1 et cetera.</p> <p>2 Is it accurate that you also helped</p> <p>3 integrate Google into the Sonos partner ecosystem?</p> <p>4 MS. BRODY: Objection; form.</p> <p>5 BY MR. WILLIAMS:</p> <p>6 Q You can still answer that question. I'm</p> <p>7 sorry.</p> <p>8 A It is not very precise.</p> <p>9 Q How would you make it more precise?</p> <p>10 A I led a team that helped Google integrate</p> <p>11 into the Sonos ecosystem. I did not necessarily</p> <p>12 personally do that.</p> <p>13 Q Okay. So part of your role and</p> <p>14 responsibilities was to oversee the team that did</p> <p>15 help integrate Google to the Sonos ecosystem; is</p> <p>16 that fair?</p> <p>17 A That is correct.</p> <p>18 Q The next bullet point you say you "Created</p> <p>19 Sonos' new Developers and Partner Portal and Hosted</p> <p>20 Annual Sonos Partner Summit."</p> <p>21 What do you mean by the "new Developers and</p> <p>22 Partner Portal"?</p> <p>23 A If you fire up your browser and go to</p> <p>24 Developer.Sonos.com, that is the new partner portal.</p> <p>25 Q Okay. What is the point of a partner</p>

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<p style="text-align: right;">Page 22</p> <p>1 portal?</p> <p>2 A It's a virtual, it's on line, it's in the</p> <p>3 cloud, it's an entry point for partners to find all</p> <p>4 documentation about the Sonos platform, the API</p> <p>5 documentation, sample application, sample code</p> <p>6 snippets that help them build their integration on</p> <p>7 the way to submitting whatever they built for Sonos'</p> <p>8 review and managing their partnership.</p> <p>9 So it's -- I don't know how else to say it.</p> <p>10 It's a partner portal.</p> <p>11 Q When did you create this partner portal for</p> <p>12 Sonos?</p> <p>13 A I don't remember the exact time. Maybe</p> <p>14 between 2014 and '17.</p> <p>15 Q Okay. Do you recall why you created the</p> <p>16 partner portal?</p> <p>17 A Sonos had a partner portal at the time I</p> <p>18 joined, and it wasn't well-organized and it was very</p> <p>19 outdated technology, so we reimplemented a new</p> <p>20 modern version to make it easier for partners to</p> <p>21 integrate with Sonos.</p> <p>22 Q And throughout the -- the team that you</p> <p>23 oversaw with the Google integration to the Sonos</p> <p>24 platform, do you recall if Google had access to the</p> <p>25 partner portal for that same integration?</p>	<p style="text-align: right;">Page 24</p> <p>1 "free-flowing." I don't know what you mean by that.</p> <p>2 BY MR. WILLIAMS:</p> <p>3 Q Sure. That Google and Sonos -- I'll</p> <p>4 rephrase the whole question.</p> <p>5 Is it fair to say that before the partner</p> <p>6 portal, that Google and Sonos routinely exchanged</p> <p>7 information between the two companies; is that --</p> <p>8 MS. BRODY: Objection; form.</p> <p>9 If you understand that question,</p> <p>10 Mr. Schmerder, you can answer.</p> <p>11 THE WITNESS: I don't understand freely.</p> <p>12 We exchanged documents, yes.</p> <p>13 BY MR. WILLIAMS:</p> <p>14 Q Okay. So Sonos sent documents to Google;</p> <p>15 is that correct?</p> <p>16 A That is correct.</p> <p>17 Q And Google sent documents back to Sonos as</p> <p>18 well; correct?</p> <p>19 A Correct.</p> <p>20 Q Next bullet point you say that you "Drove</p> <p>21 product strategy and roadmap for the Sonos</p> <p>22 Platform."</p> <p>23 What do you mean by you drove product</p> <p>24 strategy for the Sonos platform?</p> <p>25 A So my team was not only in charge with</p>
<p style="text-align: right;">Page 23</p> <p>1 A I actually do not recall that, no.</p> <p>2 Q Do you have any reason to believe that</p> <p>3 Google did not have access to the partner portal</p> <p>4 throughout the integration process?</p> <p>5 A We worked with Google before we had the</p> <p>6 partner portal, which means they had access to all</p> <p>7 of the documents that were listed there, or most of</p> <p>8 the important documents that were listed there</p> <p>9 before they existed on the portal. So they might</p> <p>10 not have needed this access.</p> <p>11 Q So fair to say that before the partner</p> <p>12 portal that Google and Sonos had a free-flowing of</p> <p>13 information between the two companies; is that</p> <p>14 correct?</p> <p>15 MS. BRODY: Objection; form.</p> <p>16 THE REPORTER: I didn't hear the answer.</p> <p>17 THE WITNESS: Can you rephrase the</p> <p>18 question?</p> <p>19 BY MR. WILLIAMS:</p> <p>20 Q So fair to say before the partner portal,</p> <p>21 that Google and Sonos had a free-flowing of</p> <p>22 information between the two companies; is that</p> <p>23 correct?</p> <p>24 MS. BRODY: Objection; form.</p> <p>25 THE WITNESS: Can you rephrase</p>	<p style="text-align: right;">Page 25</p> <p>1 working on the partner integration, but also in</p> <p>2 charge of defining what kind of integrations Sonos</p> <p>3 would want and allow on our platform, and what kind</p> <p>4 of APIs we would have to make available to the</p> <p>5 developer ecosystem over time to enable those</p> <p>6 integrations.</p> <p>7 Q When you say -- when you mentioned what</p> <p>8 kind of integration, what do you mean by that?</p> <p>9 A I'll answer that with an example and you</p> <p>10 can ask another question.</p> <p>11 Q Sure.</p> <p>12 A Should your doorbell play on Sonos?</p> <p>13 Somebody is at your door and they ring your</p> <p>14 doorbell, should you get a chime or a notification</p> <p>15 playing on your Sonos speaker in the room that</p> <p>16 they're currently in? It was one of these questions</p> <p>17 that we discussed.</p> <p>18 So should we give manufactures like Ring</p> <p>19 that makes smart doorbells an API to find out where</p> <p>20 in your home you're currently located and play the</p> <p>21 doorbell sound on that speaker interrupting the</p> <p>22 music. And we had about -- we had many, many</p> <p>23 questions like that.</p> <p>24 Q Okay. And who was typically involved in</p> <p>25 the decision as to what kind of integrations should</p>

7 (Pages 22 - 25)